

# EXHIBIT A



**Shook, Hardy & Bacon L.L.P.**

2555 Grand Boulevard  
Kansas City, MO 64108-2613  
(816) 474-6550

**JOHN LEWIS JR.**  
RECEIVER  
600 TRAVIS ST., SUITE 3400  
HOUSTON, TX 77002-2926

**Invoice No:**  
**Invoice Date:**  
**Matter Number:**  
**Billing Attorney:**

**3008158**  
04/27/2023  
33206.393697  
John Lewis Jr.

**Summary of Invoice**

For Professional services and disbursements thru **March 31, 2023**

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

Current Fees	\$46,672.50
<b>Total Current Fees and Disbursements</b>	<b>\$46,672.50</b>
Previous Balance	21,419.53
<b>Total Amount Due</b>	<b>\$68,092.03</b>

**REMITTANCE INFORMATION**

***Please verify your records reflect our new Wiring Instructions and Remit Address.***

**Wiring Instructions**

Commerce Bank  
1000 Walnut  
Kansas City, MO 64106  
ABA Number: 101000019  
SWIFT: CBKCUS44  
Account Number: 43056

**Remit Address**

Shook, Hardy & Bacon L.L.P.  
PO Box 843718  
Kansas City, MO 64184-3718

**Federal Tax ID:**

44-0585497

Payments received after March 31, 2023 may not be reflected herein.



33206.393697 3008158 04/27/2023

**Invoice Detail**For Professional services and disbursements thru *March 31, 2023*

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

**Professional Services**

<b>Date</b>	<b>Attorney</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
<b>SEC01     Asset Analysis</b>				
01/19/23	JLJ	Review and approve website modifications related to sale of receivership assets; emails exchanges regarding same. (.8); Evaluate offer of Waller real estate and give direction to broker (.5); Consideration of turnover demand on non-party related to Chavez - multiple emails and discussion (1.2)	2.50	\$1,312.50
02/01/23	JLJ	Assessment of preliminary claim materials for action against money order issuers (1.0); attention to banking matters on Chicago operations. (.4); attention to turns of Chavez budget requests and supporting data (.4)	1.80	945.00
<b>Subtotal for SEC01     Asset Analysis</b>			<b>4.30</b>	<b>\$2,257.50</b>
<b>SEC02     Asset Disposition</b>				
02/02/23	JLJ	Review turns of emails regarding recovery of receivership assets in Chavez possession (.6); Review of suit papers in Moneygram enforcement action (.8); Review of exchanges regarding Bianance and Squareup (1.5); Review of laws and procedures regarding appraisal and marketing of Marshall property (.8)	3.80	\$1,995.00
02/03/23	JLJ	Revisions to special conditions section contract for sale of Waller County property (.6) Turns of draft response to Flack letter for transmittal to court. (.8); Review new information regarding ongoing fraud and exchanges regarding recovery of ongoing call records. (1.1)	2.50	1,312.50
02/06/23	JLJ	Investigation of potential interest in Lake Conroe property and related post receivership appointment transfers.	0.80	420.00
02/07/23	JLJ	Calls and review of documents relating to Waller County deed office and records update regarding Tidmore property. Review public records regarding ownership of same by CBT.	2.50	1,312.50



33206.393697 3008158 04/27/2023

Date	Attorney	Description	Hours	Amount
02/14/23	JLJ	Review of real estate listing and offer documents for Hogan Lane property.	0.80	420.00
02/16/23	JLJ	Attention to closing and title company requirements incident to the closing of Hogan property. Briefing regarding paths to liquidation of Binance crypto account.	1.20	630.00
03/07/23	JLJ	Attention to review of closing documents related to Lawrence Marshall property. Attention to bank statement and financial review.	3.20	1,680.00
03/28/23	JLJ	Review of revised closing documents for sale of Hogan property.	0.70	367.50
<b>Subtotal for SEC02 Asset Disposition</b>			<b>15.50</b>	<b>\$8,137.50</b>

**SEC04 Case Admin**

01/11/23	JLJ	Attention to review of SFAR report element of interim report to court. Additional inquiry to team regarding same (.8); Exchanges regarding employee interviews (.5); Review and notes regarding Flack recently propounded RFP and exchanges with team regarding response and range of approaches to share receivership documents (.5) Approve website changes and review media accounts (.6) Review and reconciliation of bank accounts and open reimbursable estate (.9)	3.30	\$1,732.50
01/19/23	JLJ	Review and approve liquidation plan (.4); attention to response and cost elements related to Salesforce subpoena. (.4).	0.80	420.00
01/23/23	JLJ	Analysis of issues regarding Flack discovery and Chavez allowance request. Skim liquidation report and draft for filing. Consideration of purchasing Salesforce licenses.	1.20	630.00
02/06/23	JLJ	Confer and approve updates to hotline and website.	0.70	367.50
02/13/23	JLJ	Strategic team discussions providing guidance on real estate sale issues, outreach to CFX employees regarding commissions paid, locating and examination of "leaders" and "brokers", MSB outreach, expansion of receivership and third party lawsuits.	2.20	1,155.00
02/13/23	JLJ	Best practices call with M. Gulde, A. Bambach and Neal Jacobson of SEC . Debrief and action items call following with KP and ST.	2.20	1,155.00
02/20/23	JLJ	Detailed review of Hay's draft Ponzi report and exhibits. Comments to same.	2.80	1,470.00



33206.393697 3008158 04/27/2023

Date	Attorney	Description	Hours	Amount
02/22/23	JLJ	Attention to Gomez cooperation deliberations. Followup on IL subpoena related issues. Attention to seller info request (Hogan property). Investigate Land Management invoice including calls with taxing authorities regarding receivership.	2.80	1,470.00
03/20/23	JLJ	Strategize with team on open matters in preparation for hearing. Attention closing documents regarding Hogan property sale.	1.60	840.00
03/23/23	JLJ	Prepare for an attend Show cause hearing.	3.50	1,837.50
<b>Subtotal for SEC04</b>		<b>Case Admin</b>	<b>21.10</b>	<b>\$11,077.50</b>

**SEC05 Claims Admin**

01/30/23	JLJ	Attention to Webster's Auction inventory report and invoice, related banking (.4); Attention to Benvenuto living allowance request, related banking (.4); Team call to discuss interim report, employee subpoenas, outreach to sales agents (.1.4), Strategize response to Flack letter to court on fees, review fee guidance in other receivership cases (.5); Considerations as to expansion of receivership by motion (.3); Review and edit draft interim report (.8); Skim Blocktrace work product (1.1)	4.90	\$2,572.50
03/01/23	JLJ	Review and analysis of Chavez revised proposed living budget as required by receivership order (.8); Review and approve private sale motion and proposed order (.4) Skim case law regarding use of receivership funds for defendant's legal fees in preparation for hearing (.9)	2.20	1,155.00
<b>Subtotal for SEC05</b>		<b>Claims Admin</b>	<b>7.10</b>	<b>\$3,727.50</b>

**SEC11 Status Reports**

01/31/23	JLJ	Turns of quarterly interim report.	3.20	\$1,680.00
03/27/23	JLJ	Strategize regarding guidance from judge and review pending real estate closing with team. Review of open issues in Ponzi report.	1.50	787.50
<b>Subtotal for SEC11</b>		<b>Status Reports</b>	<b>4.70</b>	<b>\$2,467.50</b>

**SEC12 Litigation Consulting**

02/09/23	JLJ	Detailed consideration of MSB regulations regard Bank Secrecy Act in light of large volume of money orders utilized by CFX. Strategize regarding same.	1.50	\$787.50
02/20/23	JLJ	Strategize team regarding responses to IL, Flack and other inbound discovery requests propounded and confidentiality considerations associated.	1.30	682.50



33206.393697 3008158 04/27/2023

Date	Attorney	Description	Hours	Amount
02/27/23	JLJ	Analysis of strategic issues related to additional third party subpoenas to Zelle and other mobile cash applications. Discuss responses to Flack RPD's. Strategize regarding status call with Judge regarding Flack fees and conferrals on other open issues with Chavez living allowance.	1.80	945.00
<b>Subtotal for SEC12</b>		<b>Litigation Consulting</b>	<b>4.60</b>	<b>\$2,415.00</b>

**SEC13      Litigation**

02/06/23	JLJ	Attention to motions to approve sales of property. Consideration of means and method of sale of Chavez personal property following inventory and appraisal. Consideration of objections by former CFX employee to subpoena. Review, comment and consider next steps to Flack Surreply.	1.80	\$945.00
03/02/23	JLJ	Prepare for and participate in Status conference with Judge.	1.50	787.50
03/06/23	JLJ	Strategize with team regarding open issues from status call with court, including privilege assertion issues, trial setting, ponzi expert report preparation	1.80	945.00
03/21/23	JLJ	Reading articles and other case pleadings to inform strategic options on "net winner" clawback litigation and D&O claims.	4.50	2,362.50
03/22/23	JLJ	Prepare for hearing on fees, show cause and related matters.	3.50	1,837.50
03/30/23	JLJ	Call with CMG and B. Abernathy (BSA expert) regarding strategic considerations for pursuing potential claims of enabling fraud.	1.20	630.00
<b>Subtotal for SEC13</b>		<b>Litigation</b>	<b>14.30</b>	<b>\$7,507.50</b>

**SEC16      Valuation**

01/05/23	JLJ	Review and approve crypto expert retention proposal, inquiries regarding same. (.6); Review information on "leaders" database (.4); correspondence counsel for Aspire Oak apartments regarding Chavez payment history and access(.4).	1.60	\$840.00
01/06/23	JLJ	Detailed review of CBT/Torres document production to evaluate strategic next steps.	1.50	787.50
01/09/23	JLJ	Attend SEC deposition (Lemus). Confer with M. Gulde (SEC) and ST afterwards.	5.80	3,045.00
01/10/23	JLJ	Inspection of Chavez residence with auctioneer/appraiser and ST.	2.50	1,312.50



33206.393697 3008158 04/27/2023

Date	Attorney	Description	Hours	Amount
01/17/23	JLJ	Review ongoing work streams with team including expansion of receivership, sales agents, Chavez inbound discovery requests and Salesforce subpoena.	1.40	735.00
03/15/23	JLJ	Visual inspection of undeveloped parcel in Waller County. Review and offer edits to closing documents. Attention to further extension on employee tax documents based upon lack of required company records.	4.50	2,362.50
<b>Subtotal for SEC16</b>		<b>Valuation</b>	<b>17.30</b>	<b>\$9,082.50</b>
<b>Total</b>			<b>88.90</b>	<b>\$46,672.50</b>

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	88.90	\$525.00	\$46,672.50
<b>Total Fees</b>		<b>88.90</b>		<b>\$46,672.50</b>

<b>Total Current Fees and Disbursements</b>	<b>\$46,672.50</b>
Previous Balance	21,419.53
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